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cc: Alessandra Perrone, Historic England,
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5 March 2024

Dear Becky Jones,

PL/2024/00720 & PL/2024/00373
Leaden Hall, 70 The Close, Salisbury SP1 2EP

Thank you for consulting the Georgian Group on the above applications for Leaden Hall, a Grade I listed building within the precinct of Salisbury Cathedral. As the Group was not party to the extensive pre-application discussions behind the applications, we are grateful for the extension of time which allowed us to make a site visit and to consult members of our Casework Committee. The following comments, which constitute a formal **objection**, reflect the advice of that Committee.

Severe damage to the Grade I listed building and Urgent Works

Before considering the proposals, we draw your authority's attention to the condition of the Grade I listed building's fabric. This has been allowed to deteriorate to an alarming degree: on our site visit (20 February) we saw severe damage caused by water ingress on the south side of the building with widespread rot of timbers, damage to historic features and fittings, growth of vegetation, and damaged plasterwork. A large section of the drawing room ceiling - close to a particularly fine cornice - has collapsed entirely. Your Conservation Officer and Historic England's Inspector took photographs at the site visit and we also have a photographic record of the damage; the images in the applicant's Design and Access Statement do not convey the severity of the situation.

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The failure to prevent or address damage of this kind to a Grade I listed building is wholly unacceptable (we refer to Historic England's letter of 29 February). We urge your authority to consider whether it is appropriate in this case to use its statutory powers under the Planning (Listed Buildings and Conservation Areas) 1990 Act to ensure urgent works of repair and protection are carried out. While awaiting the outcome of planning applications it is standard good practice to start drying out a building in a deteriorated condition and to ensure further deterioration is prevented. In our view there is no justification for delaying these works any further and the applicant should not be permitted to make such works conditional on consent for the scheme – particularly if, as we will say, those proposals are themselves harmful.

We ask your authority to consider whether paragraph 202 of the NPPF (December 2023) is relevant in this case. This states that 'where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision'.

Significance of the listed building and its setting

The original canonical house on the site was built by Elias de Dereham, designer of the Cathedral; the list entry suggests it was probably one of earliest in the Cathedral Close. The present house was built to the north of its predecessor in 1717 making use of some medieval stonework. Until 1914 the house had an early thirteenth century cross-wing (shown in a drawing of c.1810 by E J Buckler); evidence of this wing can be seen on the walls south of the house. The early eighteenth century house was rebuilt c. 1800 when the Chancellor of the Diocese, William Douglas, paid for extensive embellishments - including Regency Gothic buttresses and porch to the principal eastern elevation and an imposing Gothic arch leading from the north side of the forecourt to the stableyard.

On several occasions in the early nineteenth century John Constable was a guest of the then occupant of Leaden Hall, Archdeacon John Fisher. It was from here that the artist produced sketches for his celebrated views of the Cathedral, one of which, 'Salisbury Cathedral and Leadenhall from the River', shows part of the western elevation of the house glimpsed from the water meadows. The verdant tranquil setting of Leaden Hall, contained in a series of screen walls, largely survives today - albeit compromised by Stephenson Hall, a timber and glass structure added in the garden west of the house in 2004 to facilitate use of the site as a school. Regrettably this severed the picturesque view of the Cathedral from the river recorded by

Constable.

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A large uPVC conservatory on the north-western elevation of the house is another unsympathetic modern encroachment.

Internally, use as a school for much of the twentieth century resulted in the loss of some of Leaden Hall's historic features. However, the planform remains legible and some fine Neo-Classical interiors survive; it is these that we were concerned to see in a very deteriorated state on our site visit.

As a Grade I listed building, Leaden Hall is a designated heritage asset of the highest significance with high historic value – not least for the association with Constable. The building forms part of a grouping of buildings in the Cathedral Close of very high significance. This grouping includes the Walton Canonry of c. 1720 (Grade I) and Myles Place (Grade I, 1718-22). Leaden Hall stands within Salisbury City Conservation Area. It derives much of its significance from its immediate setting in gardens beside the water meadows and its wider setting within the Cathedral Close.

The proposals: general comments

The present scheme, developed by the Dean & Chapter of Salisbury Cathedral following the departure of the school from the site in 2017, comprises:

- the change of use Leaden Hall from education to offices and meeting rooms to include (demolition of single storey extensions and demolition of a conservatory; internal changes, including the provision of a lift; associated works and repairs to the fabric of the building)
- retention and change of use of Stephenson Hall from education to a mixed use to allow the building to be used for meetings, performances and continued educational use to include
- the removal of classrooms attached to Stephenson Hall
- erection of an archive building south of Leaden Hall within its immediate setting to hold the Cathedral archive
- erection of a solar array adjacent to the archive building
- provision of parking with Electric vehicle charging points in the forecourt of Leaden Hall
- external changes including the realignment of a service gate, internal driveways and the removal of a section of wall to facilitate access to the proposed archive
- landscaping of the grounds of Leaden Hall

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The overall aspiration behind these proposals is to create a Cathedral hub consolidating administrative, archival and educational functions on one site. We understand the aspiration but are unconvinced that Leaden Hall is the appropriate site for this hub; it is regrettable that pre-application discussions with the applicant did not begin with further scrutiny of this decision.

Overall, we consider this is a scheme which would result in a high degree of less than substantial harm to Leaden Hall by virtue of the alterations to the listed building itself and development in its setting. This high level of harm is not offset by the modest heritage gains the scheme brings (the removal of some unsympathetic modern accretions) and, in our view, there are not sufficient compensating public benefits to outweigh this harm in the overall planning balance (the applications engage paragraphs 206 and 208 of the National Planning Policy Framework and these are discussed in the policy section below). Although we have considerable concerns about the detail of what is proposed, it is the principle itself which we strongly recommend your authority resists in the absence of further justification.

Consultants at Alan Baxter Ltd, acting on behalf of the Salisbury Cathedral Close Preservation Society, as well as other objectors to the scheme, have brought to our attention the existence of a Masterplan for a Salisbury Cathedral, *An Exceptional Place* (2016) which was endorsed by the Planning Committee of Wiltshire Council in 2017 as a material consideration in the determination of applications.

In their response to this scheme, Alan Baxter Ltd point out that the present proposals fail to comply with the Masterplan in several areas. In particular, the Masterplan identifies the works yard on the South Side as the appropriate location for a new archive facility. It is unclear to us why the Dean and Chapter have chosen to depart from the recommendations and assumptions in the Masterplan – particularly in respect of the archive building - and to adopt a less strategic and more disjointed approach to the management of its property portfolio more generally.

Before pursuing a new office/hub use for Leaden Hall so decidedly, we would have expected the applicant to produce a thorough options appraisal examining all possible uses for Leaden Hall and explaining why alternatives (single or multiple residential use, for example) have been discounted. This piece of justification is notably lacking from the documentation. Similarly a thorough location options appraisal for the archive/education use has not been made available, so your authority cannot be satisfied that this scheme is the least harmful way of delivering



this within the Cathedral estate. That provided at Appendix A of the Design and Access Statement does not seriously engage with the South Side option.

The proposals: detailed comments

The Group objects to the principle of these applications. In terms of what is before us, however, we highlight the following areas where harm is particularly apparent.

Alterations to Leaden Hall

The interventions needed to facilitate conversion to office use are undoubtedly harmful. For example, the provision of a passenger lift from ground floor (GF15) to second floor will entail the loss of historic fabric (see Design and Access Statement, 5.5). The applicant considers this the 'least harmful location' and explains it has been chosen in pre-application discussion with Historic England, but we note (letter of 29 February) that Historic England considers this intervention inherently harmful. The applicant refers to remodelling of this area of the building in the later nineteenth century and accords it lower significance as a result, but we are concerned that there does not appear to be a strong grasp of the building's phasing overall.

The interventions that are needed to the fabric of Leadenhall to facilitate change of use to offices are manifestly harmful and yet the applicant has not seriously engaged with other uses. The proposed use should not, in our view, be accepted without much further scrutiny.

In respect of the repair of the roof – work which is urgently needed to address water penetration through the building – we share Historic England's concerns about the proposed methodology and lack of supporting information. The schedule of work entails the raising of the roof structure at eaves level, the replacement of the ridge and tie beams, the replacement of tiles, and the removal of a chimney stack. We were shown parts of the roof construction on our site visit which comprises eighteenth century fabric and reused medieval timbers. Your authority will need further explanation and justification (particularly in relation to the works to raise the structure) to be satisfied that the impact on historic fabric has been minimized.



Stephenson Hall

We support the removal of classrooms from the periphery of Stephenson Hall. We strongly advocate its complete removal so that a key historic view across the site can be restored and the setting of Leaden Hall enhanced. Although we acknowledge re-provision of the same or similar accommodation elsewhere might also cause harm, we do not consider your authority can concede Stephenson Hall's retention without a much more compelling explanation of how the structure fits into the longer-term planning for the site.

Archive building

The decision to site the archive building in this location is highly questionable. As already stated, it contradicts the assumptions in the Cathedral's own Masterplan. The Masterplan, p. 23, notes that one suggestion arising from consultation was that a shared archive could be created for use by the Cathedral, Salisbury Museum and Sarum College. Was this idea explored before the present proposals were progressed? We assume this idea was dismissed along with the vision for the South Side.

We are concerned that the applicant has both underestimated the impact of the proposed archive building on the setting of the Grade I listed building and given insufficient thought to future scenarios which might require the archive to have independent access. The location option chosen - south of the formal garden - is extremely close to the southern elevation of the listed building. In our view this assertive new structure would excessively dominate the main house.

We did not find the discussion of design precedents (DAS, section 7.4) persuasive. If anything, the new structure creates confusion, historically speaking, given the existence previously of a cross-wing to the house itself. In terms of scale and massing, we note that the ridge line of the new structure will rise well above the eaves level of the listed building. We share Historic England's opinion that the view studies provided (DAS, 7.8) are incomplete and insufficient evidence on which to base a full assessment of harm to setting. The proposal to remove a section of the southern forecourt wall to provide access to the archive entails loss of historic fabric and further harm to Leaden Hall's significance (including, potentially, to archaeology).



There is a strong presumption in favour of public visibility and sensible access arrangements for significant archives such as that belonging to Salisbury Cathedral. We maintain the view that Leaden Hall cannot deliver these requirements and that in attempting to make this site function for an inappropriate use, the proposals cause unacceptable and unjustified harm to historic significance. The flood risk identified makes the site still less appropriate for such a building.

This is the most harmful and least justified element of the applications and, in our view, the one which should be most strongly resisted by your authority.

Solar array

Linked to the archive building, a ground level array of 216 PV panels each of 430W peak capacity is proposed on the tennis court site (see DAS, p. 62). The disused tennis courts detract from Leaden Hall's setting and their removal is welcome. However, this modest gain would be immediately outweighed by the visual harm caused by the PV array. Although the Group supports the applicant's overall commitment to energy efficiency, this particular aspect of the proposals appears opportunistic.

Relevant policy considerations

Paragraph 205 of the NPPF (December 2023) states: 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation' while paragraph 206 makes clear that 'any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification'.

Paragraph 208 states that 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'. Paragraph 212 advises that 'local planning authorities should look for opportunities for new development [...] within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably'.



The applications do not satisfy the requirements of these key national planning policy tests. As stated above, we also ask your authority to consider whether paragraph 202 applies in this case – in relation to the deteriorated condition of the building.

Finally, we remind your authority that a Conservation Area is a designated heritage asset for the purposes of the NPPF and that under Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 local authorities have a duty to pay special attention to the desirability of preserving or enhancing the character or appearance of Conservation Areas.

Recommendation

The Georgian Group considers that these applications, as presently envisaged, would cause a high degree of less than substantial harm to the significance of the Grade I listed building and its setting. Your authority has been given no sense of how these proposals form part of a strategic, integrated approach to the management of the Cathedral's estate and the applicant has not provided 'clear and convincing justification' for the harm that would result. The applications are not policy compliant and we strongly recommend your authority refuses them.

A Masterplan for the Cathedral's estate, including the management of property on the Cathedral Close, is already in existence; it is to this that we encourage the Dean & Chapter to return when considering the future of Leaden Hall.

We would be grateful if you could notify us of your decision in due course.

Yours sincerely,

Anya Lucas
Conservation Adviser (South West)